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23 UNITED STATES DISTRICT COURT

24 NORTHERN DISTRICT OF CALIFORNIA

25 SAN FRANCISCO DIVISION

26 SONOS, INC.,

27 Plaintiff and Counter-
28 Defendant,

29 vs.

30 GOOGLE LLC,

31 Defendant and Counter-
32 Claimant.

Case No. 3:20-cv-06754-WHA

Consolidated with Case No. 3:21-cv-07559-
WHA

**GOOGLE LLC'S UNOPPOSED
ADMINISTRATIVE MOTION TO
EXTEND DEADLINES FOR NEW
MOTION TO SEAL AND PUBLIC
REFILINGS PURSUANT TO DKT. 846**

Pursuant to L.R. 6-3, Google LLC respectfully moves for an order extending the deadlines for Google’s new omnibus motion to seal and the parties’ refilings of all material they no longer to seek to seal. On July 19, 2023, the Court instructed Google to “file any new omnibus motion that justifies sealing information that may still deserve secrecy from the public, with the requested declaration, by **July 31, 2023, at Noon**” and directed that “[a]ll material that the parties no longer seek to seal shall now be publicly refiled no later than **August 14, 2023, at Noon.**” Dkt. 846 (“Order”) at 3. Since receiving the Court’s order, Google and Google’s counsel have worked diligently to ensure that the revised sealing requests are as narrowly tailored as possible. Declaration of Jocelyn Ma (“Ma Decl.”) ¶ 3.

However, given the breadth of the documents and information at issue, Google requests additional time to prepare its revised sealing requests. Specifically, Google requests an extension in order to: (1) undertake the necessary preparations for the public disclosure of business information in light of the fact that documents Google previously sought to seal include detailed technical specifications, identification of source code information, and Google’s business plans regarding the relevant products, (2) determine the impact of disclosure and level of confidentiality attributed to each portion of these and other categories of documents, and (3) provide detailed information for the bases for each request to seal such that they “speak to specific information in specific passages” and describe any narrowing from the original request and any revised request. *Id.* Dkt. 843 at 3; *see* Ma Decl. ¶ 4. In addition, Google seeks an extension to allow its lead counsel to “vet[] each and every request to seal, as to each and every argument, as to each and every passage that Google seeks to seal.” Dkt. 843 at 3.

Allowing Google additional time to narrow its sealing requests will thus facilitate the “hard look at the documents that Google moved to seal” directed by the Court’s Order and minimize the volume of materials for the Court’s review. *Id.* In addition, without an extension, Google will be substantially harmed by being unable to thoroughly analyze each previous passage that it sought to seal and determine whether such information needs to remain under seal—potentially resulting in the disclosure of highly sensitive and confidential information and/or the submission of a revised request to seal that is inadvertently deficient with respect to the requirements of the Court’s order.

1 Ma Decl. ¶ 5.

2 Accordingly, Google requests that the Court extend the deadline for Google to file a new
3 omnibus sealing motion to August 14, 2023 at noon and the deadline for the Parties to publicly refile
4 any material they no longer seek to seal to September 5, 2023 at noon. This proposed schedule
5 would not affect the parties' ability to comply with the other deadlines set forth in this case. *Id.*
6 ¶ 7. Google requested that Sonos, Inc. ("Sonos") stipulate to this extension; Sonos refused to do so
7 but indicated that it would not oppose Google's motion to extend. *Id.* ¶ 6.

8 DATED: July 28, 2023

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